

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ROSE ANN PAGUIRIGAN, individually and
on behalf of all others similarly situated, :

Plaintiff, : 1:17 Civ. 1302 (NG) (JO)

-vs- : **NOTICE OF MOTION**

PROMPT NURSING EMPLOYMENT AGENCY :
LLC d/b/a SENTOSA SERVICES,
SENTOSACARE LLC, SENTOSA NURSING :
RECRUITMENT AGENCY, BENJAMIN LANDA,
BENT PHILIPSON, BERISH RUBENSTEIN a/k/a :
BARRY RUBENSTEIN, FRANCIS LUYUN,
GOLDEN GATE REHABILITATION & HEALTH :
CARE CENTER LLC, and SPRING CREEK
REHABILITATION AND NURSING CENTER, :

Defendants. :
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PLEASE TAKE NOTICE that, upon the annexed Declaration of John Howley, the exhibits annexed thereto, the accompanying Declaration of Leandro B. Lachica, the accompanying Memorandum of Law, and all prior proceedings had herein, plaintiff Rose Ann Paguirigan will move this Court, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, on a date and at a time to be determined by the Court, for an Order:
(a) certifying this action as a class action pursuant to Rule 23(b)(3) or, in the alternative, Rule 23(b)(2) of the Federal Rules of Civil Procedure; (b) appointing plaintiff's attorneys to represent

the class; and (c) granting such other relief as this Court deems just.

Dated: New York, New York
December 29, 2017

THE HOWLEY LAW FIRM P.C.

By: /s John Howley
John Howley
Leandro B. Lachica
350 Fifth Avenue, 59th Floor
New York, New York 10118
(212) 601-2728
Attorneys for Plaintiff